

EXHIBIT G

JENNER & BLOCK LLP
Reid J. Schar (*pro hac vice*)
RSchar@jenner.com
353 N. Clark Street
Chicago, IL 60654-3456
Telephone: (312) 222-9350
Facsimile: (312) 527-0484

CLARENCE DYER & COHEN LLP
Kate Dyer (Bar No. 171891)
kdyer@clarencedyer.com
899 Ellis Street
San Francisco, CA 94109-7807
Telephone: (415) 749-1800
Facsimile: (415) 749-1694

CRAVATH, SWAIN & MOORE LLP
Kevin J. Orsini (*pro hac vice*)
korsini@cravath.com
825 Eighth Avenue
New York, NY 10019
Telephone: (212) 474-1000
Facsimile: (212) 474-3700

Attorneys for Defendant PACIFIC GAS AND
ELECTRIC COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PACIFIC GAS AND ELECTRIC
COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**DECLARATION OF [REDACTED] IN
SUPPORT OF RESPONSE TO ORDER
REQUESTING INFORMATION ON
DIXIE AND BADER FIRES**

Judge: Hon. William Alsup

1 I, [REDACTED] declare at follows:

2 1. I am currently employed by Pacific Gas and Electric Company ("PG&E") as the
3 Vegetation Management Supervisor, North Valley South, and I have training as an arborist. I
4 make this declaration based upon personal knowledge and, if called as a witness, I could and
5 would testify competently to the matters set forth herein.

6 2. I accompanied a Cal Fire investigations team that was visiting what I understand to
7 be the suspected area of origin of the Dixie Fire ("site") on July 18, 2021, although I was not
8 allowed to view the site on that occasion. I returned to the site on July 24, 2021 and again on July
9 26, 2021, when I was able to view portions of what I was told was a tree that had fallen onto the
10 Bucks Creek 1101 line. The stump had been removed and the roots of the tree were
11 approximately 40 feet from the line. The tree is a Douglas Fir.

12 3. I visited the site of the Bader Fire along the Paradise 1105 line on July 15, 2021. I
13 observed that the portion of the tree that was reported to have fallen into the line was one stem of a
14 two stemmed Black Oak Tree. The stump of the Black Oak was approximately 60 feet from the
15 line. The broken stem was approximately 11 inches in diameter. The tree had been marked with
16 blue paint and a bar code. PG&E does not use bar codes as part of its standard vegetation
17 management marking system.

18 4. Attached to this declaration are eight photos I took at the site of the Bader Fire on
19 July 15, 2021. As depicted in the photographs, affixed to the bottom of the tree was a bar code
20 with the words "Camp Fire Tree Removal Project." I understand that that the California Office of
21 Emergency Services coordinates post-Camp Fire tree removal work.

22 I declare under penalty of perjury under the laws of the United States and the State of
23 California that the foregoing is true and correct.

24 Executed this 28th day of July, 2021, in the City of Marysville County of
25 Yuba, State of California.